

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**WEITZ & LUXENBERG'S JOINDER TO TCC'S OPPOSITION TO THE DEBTOR'S
OMNIBUS MOTION TO COMPEL AND APPLICATION TO SHORTEN TIME**

Weitz & Luxenberg, P.C. ("Weitz & Luxenberg") joins the *TCC's Opposition to the Debtor's Omnibus Motion to Compel and Application to Shorten Time* (Dkt. 659) ("TCC's Opposition") and adopts all arguments and evidence referenced therein.

Weitz & Luxenberg is one of the nine plaintiffs' law firms singled out in the *Debtor's Omnibus Motion to Compel Identified Plaintiff Firms to Supplement Certain Responses to Debtor's Interrogatories and Requests for Production* ("Motion to Compel") (Dkt. 638) and *Application to Shorten Time* (Dkt. 639) ("Motion to Shorten Time"), and, collectively, the "Motion").

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Weitz & Luxenberg requests that the Motion be denied for the reasons set forth in the TCC's Opposition, including that the Debtor's gamesmanship and lack of transparency with respect to the Motion alone warrants denial, certain of the discovery the Debtor seeks to compel is discovery that the Court has already questioned the relevance of and declined to order at this time, and the fact that the Debtor seeks information plainly protected by privilege or otherwise protected. Moreover, the fact that the AHC law firms and the PSA signatories chose to voluntarily provide claimant lists for filing with the Court has no bearing on Weitz & Luxenberg's obligation to disclose such information.

In addition, the Debtor has not yet properly served Weitz & Luxenberg. The debtor only sent a subpoena to Weitz & Luxenberg by email and on its face the subpoena contained incorrect mailing address information for Weitz & Luxenberg. The Debtor's failure to properly serve a subpoena on Weitz & Luxenberg is an independent basis that on its own warrants denial of the Motion as to Weitz & Luxenberg.

For the foregoing reasons and the reasons set forth in the TCC's Opposition, Weitz & Luxenberg requests that the Motion be denied. Weitz & Luxenberg reserves its rights to modify or supplement this joinder as necessary and appropriate.

Dated: June 1, 2023

Respectfully submitted,

WEITZ & LUXENBERG, P.C.

By: /s/ Lisa Nathanson Busch
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